

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA  
:

-v.-  
:

POST-INDICTMENT  
RESTRAINING ORDER

BENJAMIN WEY,  
a/k/a "Benjamin Wei,"  
a/k/a "Tianbing Wei," and  
SEREF DOGAN ERBEK,  
:

15 Cr. 611

Defendants.  
:

- - - - - x

Upon the application of PREET BHARARA, United States Attorney for the Southern District of New York, pursuant to Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853, based on the Affidavit of Special Agent Thomas McGuire, Federal Bureau of Investigation, executed on September 9, 2015, and upon a finding of probable cause, that the Target Properties, defined below, are subject to restraint and forfeiture pursuant to Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853,

IT IS HEREBY ORDERED that BENJAMIN WEY, a/k/a "Benjamin Wei," a/k/a "Tianbing Wei," and DOGAN ERBEK, the defendants, and all attorneys, agents, and employees, and anyone acting on the behalf of either or both, and all persons or entities in active concert or participation with any of the above, and all persons or entities having actual knowledge of this Order, shall not take any action prohibited by this Order.

IT IS FURTHER ORDERED that BENJAMIN WEY, a/k/a "Benjamin Wei," a/k/a "Tianbing Wei," and DOGAN ERBEK, the defendants, and all attorneys, agents, and employees, and anyone acting on the behalf of either or both, and all persons or entities in active concert or participation with any of the above, and all persons or entities having actual knowledge of this Order, shall not, directly or indirectly, transfer, sell, assign, pledge, hypothecate, encumber, or dispose of in any manner; cause to be transferred, sold, assigned, pledged, hypothecated, encumbered, disposed of in any manner; or take, or cause to be taken, any action that would have the effect of depreciating, damaging, or in any way diminishing the value of property or other interests belonging to, or owed to, or controlled in whole or in part by the defendants, which property or other interests are subject to forfeiture. The property and other interests hereby restrained include, but are not limited to, the following:

a. Any and all assets of York Capital Management, Ltd., including but not limited to any and all assets held in Credit Suisse, account number 0251-1367380-2;

b. Any and all assets of Strong Growth Capital, Ltd., including but not limited to:

i. any and all assets held in Credit Suisse bank account number CH6904835133178522000; and

ii. any and all assets held in HSBC Hong Kong

("HSBC-Hong Kong") bank account number 400-378774-838;

c. Any and all assets of Four Tong Investment Limited, including but not limited to any and all assets held in HSBC-Hong Kong account number 400-378766-838;

d. Any and all assets of Advantage Consultants Limited, a/k/a "Advantage Consultants, Ltd.," including but not limited to any and all assets held in HSBC-Hong Kong bank account number 400-435988-838;

e. Any and all assets of Wonderful Limited, including but not limited to any and all assets held in HSBC-Hong Kong bank account number 400-557724-838;

f. Any and all assets of Median Asset Investments Limited, including but not limited to any and all assets held in HSBC-Hong Kong bank account number 400-360822-838;

g. Any and all assets of New York Global Group;

h. Any and all assets of NYG Capital LLC, including but not limited to:

i. any and all assets held in JPMorgan Chase account number 000000726433741, held in the name "NYG Capital LLC";

ii. any and all assets held in JPMorgan Chase account number 000002730316219, held in the name "NYG Capital LLC";

i. Any and all assets of Roosen Commercial Corp.,  
including any and all assets held in Credit Suisse account

CH6904835133178522000;

j. Any and all assets of Bicornio Real Estate S.A.;

k. Any and all assets of Guo Sheng Limited; and

l. Any and all assets of Han Hua, including any and all assets held in Credit Suisse account 1013081101010 ("TARGET ACCOUNT-11"),

(collectively, the "Target Properties"), all of which are alleged to constitute funds and criminal proceeds property involved in violations of 18 U.S.C. § 1956(a)(1)(B)(i) (concealment money laundering) and § 1956(a)(2)(A) (promotion money laundering through international financial transactions).

IT IS FURTHER ORDERED that the United States Attorney's Office for the Southern District of New York, in its discretion, is authorized to direct the release of assets restrained herein;

IT IS FURTHER ORDERED Any person or entity claiming an interest in the assets listed in this Order may contact the following Assistant United States Attorney to clarify the scope of the Order: Assistant United States Attorney Andrew C. Adams, Telephone Number (212) 637-2340. Those persons or entities will not be deemed in violation of this Order for any transactions undertaken upon approval made by Assistant United States Attorney Adams.

IT IS FURTHER ORDERED that this Restraining Order shall be binding upon the defendants, the attorneys, agents, and employees, and

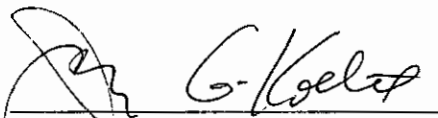
all persons in active concert or participation with any of the above, or any other person having actual knowledge of this Order, and that this Order shall remain in effect until further order of this Court;

IT IS FURTHER ORDERED that this Restraining Order and all papers submitted therewith shall be maintained under seal until such time as the unsealing of the above-captioned criminal Indictment, except that the United States Attorney's Office or its designee(s) may provide copies of this Order to any person in order to facilitate the execution of this Restraining Order, including any relevant financial institutions and/or the defendants; and

IT IS FURTHER ORDERED that service of a copy of this Order shall be made on the defendants' or their attorneys by regular mail.

Dated: New York, New York  
September 9, 2015

SO ORDERED:

A handwritten signature in dark ink, appearing to read "J. G. Koeltl", is written over a horizontal line.

HONORABLE JOHN G. KOELTL  
UNITED STATES DISTRICT JUDGE, Part 1